

Fuller, Fuller & Associates, P.A.
12000 Biscayne Boulevard, Suite 609
North Miami, FL 33181

Invoice submitted to:
Mid-Manhattan Hotel Associates LLC

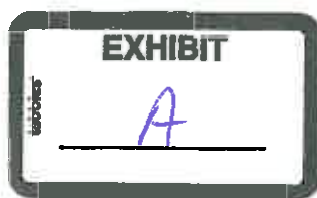
May 01, 2014

In Reference To: The Strand Hotel NYC
33 West 37th St.
New York, NY 10018

Invoice #12974

Professional Services

	<u>Hours</u>	<u>Amount</u>
<u>LAF</u>		
10/19/2013 Phone call(s) with Mr. Stern (.4)	0.40	170.00
10/20/2013 Phone call(s) with Ms. Durbin	0.40	170.00
10/30/2013 Reviewing initial presuit report of expert Durbin (.6); Reviewing ADAAG (.3)	0.90	382.50
10/31/2013 Preparing Complaint and letter to clients	1.00	425.00
11/6/2013 Preparing letter to Ms. Durbin	0.40	170.00
11/26/2013 Reviewing Order to Show Cause (1.0); Phone call(s) with client to discuss Order (.4); Reviewing Thirty Thirty case cited in the Order (.7); Reviewing other decision of Judge Freeman addressing standing (GT case)(1.3)	3.40	1,445.00
11/27/2013 Legal Research into issue of standing including recent decisions (1.8); Reviewing Trump decision on standing (.8); Reviewing Houston v. Marod (.8); Preparing Amended Complaint (1.0)	4.40	1,870.00
11/29/2013 Reviewing Kreishler v. Second Avenue Diner regarding standing (.8); starting to prepare Memorandum of Law in Response to Order to Show Cause (4.3)	5.10	2,167.50
12/2/2013 Continuing to prepare Memorandum of Law	2.70	1,147.50
12/9/2013 Continuing to make revisions to Response to Order to Show Cause	3.20	1,360.00
12/23/2013 Reviewing note from opposing counsel (.3); Phone call(s) with opposing counsel (.4); Reviewing Defendant's proposed Stipulation and Order (.5)	1.20	510.00



	<u>Hours</u>	<u>Amount</u>
12/24/2013 Reviewing Defendant's Notice of Appearance (.2); Reviewing letter from opposing counsel to Judge dated 12/23/13 (.3); Reviewing Defendant's Rule 7.1 Corporate Disclosure (.3)	0.80	340.00
1/16/2014 Reviewing Court's Notice of Initial Pretrial Conference (.4); Reviewing Individual Rules of Judge Furman (.6)	1.00	425.00
1/23/2014 Preparing Rule 26(a)(1) Initial Disclosures (.6); Preparing Expert Disclosures (.7); Reviewing Court's Civil Case Management Plan (.5); Preparing letter to opposing counsel (.6)	2.30	977.50
1/27/2014 Reviewing Defendant's 19 page Response to Order to Show Cause (2.8); Reviewing Defendant's Exhibits 1-7 in support of Defendant's position (2.1); Reviewing Defendant's Declaration of Mr. Loizos (.3); Phone call(s) with client (.5)	5.70	2,422.50
1/28/2014 Starting to prepare Plaintiff's Reply to Defendant's Response	4.30	1,827.50
Preparing Affidavit of Nelson Stern	2.00	850.00
2/10/2014 Reviewing letter from opposing counsel to Court dated 2/5/14; Preparing letter to Court (.6)	1.00	425.00
2/11/2014 Reviewing Order of 2/10/14	0.20	85.00
2/12/2014 Reviewing Order of 2/11/14 (.4); Reviewing Aguilar v. Immigration (.7); Phone call(s) with client to advise of Court Order of 2/11/14 (.3)	1.40	595.00
2/13/2014 Phone call(s) with opposing counsel concerning proposed Civil Case Management Plan, standing, and proposed settlement (.7); Phone call(s) with client (.3); legal research into decisions in 2nd Circuit and NY District regarding Standing (1.3)	2.30	977.50
2/16/2014 Reviewing Defendant's Answer to Amended Complaint, and 16 Affirmative Defenses	1.00	425.00
2/18/2014 Reviewing Defendant's settlement proposal (.5); Phone call(s) with client to discuss terms of Defendant's settlement proposal (.4); Preparing letter to opposing counsel (.4)	1.30	552.50
2/21/2014 Reviewing letter from opposing counsel dated 2/20/14 (.4); Preparing note to opposing counsel (.2); Phone call(s) with opposing counsel to discuss potential settlement and proposed Case Management Order (.4)	1.00	425.00
2/23/2014 Reviewing note from opposing counsel dated 2/23/14, along with Defendant's proposed letter to Court (.8); Reviewing Defendant's proposed Civil case Management Plan and Scheduling Order (1.2)	2.00	850.00
2/24/2014 Phone call(s) with opposing counsel pursuant to Rule 26 (f)(.5); revising letter to Court and proposed Scheduling Order (.7)	1.20	510.00
2/26/2014 Travel to N.Y. from Florida for hearing on 3/3/14 (6hrs/2=3.0)	3.00	1,275.00

	<u>Hours</u>	<u>Amount</u>
2/27/2014 Phone call(s) with opposing counsel	0.40	170.00
2/28/2014 Reviewing file in preparation for hearing set for 3/3/14	1.20	510.00
3/3/2014 Attending court hearing (3.0); traveling from N.Y. to Miami (6hrs/2=3.0)	6.00	2,550.00
3/5/2014 Reviewing Court Orders of 3/5/14	0.40	170.00
3/6/2014 Reviewing note from opposing counsel regarding court jurisdiction after settlement (.3); legal research into jurisdiction to address Defendant's note of 3/5/14 (.6); Preparing note to opposing counsel (.4)	1.30	552.50
3/7/2014 Reviewing letter from opposing counsel dated 3/7/14	0.30	127.50
3/10/2014 Reviewing note from opposing counsel dated March 10, 2014, along with Defendant's revised Settlement Agreement	1.00	425.00
3/11/2014 Preparing letter to opposing counsel (.4); Preparing revisions to Defendant's proposed Settlement Agreement of 3/10/14 (.6)	1.00	425.00
3/12/2014 Reviewing note from opposing counsel dated 3/12/14, along with Defendant's proposed changes of 3/12/14 (.4); Phone call(s) with opposing counsel (.4); Preparing note to opposing counsel (.2)	1.00	425.00
3/13/2014 Reviewing file from opposing counsel to Mr. Hampton (.2); Phone call(s) with Mag Pittman (.2)	0.40	170.00
3/14/2014 Preparing letter to opposing counsel	0.40	170.00
3/21/2014 Reviewing note from opposing counsel dated 3/20/2014 (.3); Phone call(s) with opposing counsel (.2); Preparing letter to Court (.4)	0.90	382.50
3/25/2014 Preparing letter to opposing counsel (.4)	0.40	170.00
4/7/2014 Phone call(s) with opposing counsel to discuss fee dispute	0.30	127.50
4/8/2014 Starting to prepare fee application	3.60	1,530.00
4/11/2014 Making final changes to fee application	1.40	595.00
4/27/2014 Reviewing Defendant's Declaration In Opposition To Fee Application and Reviewing Exhibits A thru K (1.8)	1.80	765.00
4/30/2014 Starting to prepare Reply To Defendant's Declaration (3.4)	3.40	1,445.00
5/1/2014 Continuing to prepare Reply to Defendant's Declaration and reviewing applicable case law (3.2)	3.20	1,360.00
SUBTOTAL:	[82.00	34,850.00]

	<u>Hours</u>	<u>Amount</u>
<u>Z-Paralegal</u>		
10/30/2013 Reviewing Deed (.3); Reviewing ownership records (.5); Reviewing Real Property Transfer Report (.4); Reviewing records of NYS Dept. of State regarding ownership and resident agent (.6)	1.80	207.00
11/6/2013 Preparing letter to Clerk	0.30	34.50
12/2/2013 Preparing letter to Clerk	0.30	34.50
3/6/2014 Tasking dates set by Court in Scheduling Order	0.50	57.50
SUBTOTAL:	[2.90	333.50]
For professional services rendered	84.90	\$35,183.50
Additional Charges :		
<u>Client Expense</u>		
10/31/2013 Open/Close File Charge		225.00
Filing Fees		400.00
Title Search		200.00
Service of Process		135.00
Re-Inspection Fee(s) to disability group		750.00
Expert fee for pre-suit inspection and pre-suit report		2,625.00
12/2/2013 Service of Process surcharge for Rush service		50.00
1/21/2014 Photocopies		20.25
2/10/2014 Telephone Charges		13.75
2/26/2014 Airfare from Florida to N.Y. and from N.Y. to Florida to attend hearing (\$500 divided by 2= \$250)		250.00
Travel expenses - Hotel, food, taxi (\$400 divided by 2= \$200)		400.00
SUBTOTAL:	[5,069.00]	
Total additional charges		\$5,069.00

	<u>Amount</u>
Total amount of this bill	<u>\$40,252.50</u>